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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK		
	X	
EDUARDO LI,	:	
Plaintiff,	:	1:15-CV-06099 (RJD-JO)
-against- CERTAIN UNDERWRITERS AT LLOYD'S, LONDON, AXIS SPECIALTY EUROPE SE;	:	DECLARATION OF BURT M. GARSON
Defendants.	: X	

BURT M. GARSON, pursuant to 28 U.S.C. § 1746, declares as follows:

- 1. I am a member of the Bar of this Court and a partner with the law firm of Kasowitz, Benson, Torres & Friedman LLP, attorneys for Plaintiff Eduardo Li. I am familiar with the facts and pleadings in this proceeding.
- 2. I submit this Declaration in support of Plaintiff's Motion For Preliminary Injunction Requiring Defendants To Pay Defense Costs.
- 3. Attached hereto as <u>Exhibit A</u> is a true and correct copy of an e-mail sent from Tracy S. Tkac, Esq., to me, Burt M. Garson, on December 10, 2015.
- 4. Attached hereto as Exhibit B is a true and correct copy of the November 25, 2015 Superseding Indictment issued by the U.S. Attorney's Office in *United States of America v. Jeffrey Webb, et. al.*, No. 15 CR 0252 (RJD).

5. Attached hereto as Exhibit C is a true and correct copy of a December 3, 2015

Federal Bureau of Investigation press release.

Dated: New York, New York

December 15, 2015

Respectfully submitted,

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

By:

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